

Outstanding Line Splitting Implementation Issues

I. Qwest

No mechanization for placing line splitting orders

(CHOICE Petition Att. C at pp. 3-4)

- All line splitting orders must be submitted manually.
- OSS only allows CFA assignment for one CLEC (whereas line splitting entails two CLECs). Only a manual workaround process available.
- Voice order must complete (both physically and electronically) before line split loop can be ordered or pre-qualified.
- Qwest can place single order for voice and data bundle.
- **Impact:** Average line splitting provisioning intervals of 4 weeks.

Excessive charges

(CHOICE Petition Att. H at pp. 7)

- Line split lines deemed “open” and incurring per-minute switching charges 100% of time.
- **Impact:** Line splitting recurring costs of over \$100/month.

II. Verizon

Multiple orders required

(CHOICE Petition Att. A at pp. 2-3)

- Voice order must complete (both physically and electronically) before line split loop can be ordered or pre-qualified.
- Verizon can place single order for voice and data bundle.
- **Impact:** Delays line splitting provisioning by at least 3-5 days, impeding CLECs’ ability to bundle.

Refusal to implement CR for LSR migrations

(CHOICE Petition Att. A at pp. 3-4)

- Refusal to implement LSR-based line splitting to line splitting migrations.
- **Impact:** CLECs forced to use lengthy manual process, including customer disconnect, in order to perform migrations.

Fictitious TNs

(CHOICE Petition Att. A at pp. 4-5)

- VZ West assigns fictional telephone numbers to UNE-P circuits.
- **Impact:** DLECs forced to use cumbersome manual process to find right TN to prequal and order line split loops.

Inability to perform Line Splitting with Resale voice

(CHOICE Petition Att. A at pp. 5-6)

- No processes for line splitting with resale voice.
- **Impact:** DLECs cannot offer xDSL to resale voice customers, and therefore resale customers have no xDSL alternatives.

Discrimination against Line Splitting with UNE-L voice

(CHOICE Petition Att. A at pp. 6-7)

- While UNE-P line splitting uses LSR process, Verizon requires ASR process for line splitting with UNE-L voice carriers, which is not commercially scalable.
- **Impact:** DLECs cannot provide line splitting in commercial volumes to UNE-L voice customers.

Central Office wiring problems

- As line splitting volumes increase and service areas expand, numerous problems in line splitting central office wiring are being increasingly discovered. In high volume states like New York, almost one quarter of COs are experiencing chronic problems in central office wiring for line splitting.
- **Impact:** Delays to line splitting rollout, as Verizon works to correct its faulty CO wiring.

Performance measures

- States need time to implement new performance measures for line splitting.
- **Impact:** DLECs will receive inadequate provisioning performance in the absence of sufficient performance measures.

III. BellSouth

Complex manual ordering processes for CLECs

(CHOICE Petition Att. B at pp. 3-6)

- 23 different ordering scenarios for line splitting, each with its own requirements.
- Only one ordering scenario is mechanized: UNE-P to line splitting with a DLEC-owned splitter.
- Previously, BellSouth only supported mechanized ordering for a BellSouth-owned splitter. For line splitting, BellSouth chose mechanized ordering only for DLEC-owned splitters.
- All of BellSouth's retail voice and data OSS is mechanized.
- **Impact:** CLECs at severe competitive disadvantage in competing for retail BellSouth customers (because line splitting customers must start out as UNE-P customers). For manual orders, the cost is more than double the costs for mechanized ordering. DLECs arbitrarily forced to shift from BellSouth-owned to DLEC-owned splitters for line splitting, which will take several months to implement.

No testing specifications for line splitting

(CHOICE Petition Att. B at pp. 6-7)

- BellSouth does not provide methods and procedures for its workforce to test and provision line splitting loops
- **Impact:** No technical assurance that line split loops will work properly when delivered. Troubles take longer to resolve.

Fictitious TNs

(CHOICE Petition Att. B at pp. 7)

- BellSouth assigns fictitious telephone numbers to UNE-P circuits.
- **Impact:** DLECs forced to use cumbersome manual process to find right TN to prequal and order line split loops.

Performance measures

(CHOICE Petition Att. B at pp. 7-8)

- States need time to implement new performance measures for line splitting.
- **Impact:** DLECs will receive inadequate provisioning performance in the absence of sufficient performance measures.

IV. SBC

Discriminatory E911 policy for line splitting

(CHOICE Petition Att. D at pp. 12-16)

- SBC assigns the Central Office street address to line split lines in E911 databases. SBC has only committed to a manual workaround.
- In California, SBC refuses any responsibility to maintain address information in E911 databases for UNE-P customers converting to line splitting.
- **Impact:** Significant public safety risks created for CLEC line splitting customers.

Numerous orders must be placed manually*(CHOICE Petition Att. D at pp. 3-4)*

- Adding UNE-P to data line or data to UNE-P line often require multiple orders, manual orders, or a combination of both – even though no actual work is performed to provision these multiple orders.
- **Impact:** Multiple manual orders unnecessarily delay line splitting provisioning. SBC also imposes excessive non-recurring rates for “provisioning” these multiple “orders.”

Inadequate trouble ticket processes*(CHOICE Petition Att. D at pp. 6-7)*

- SBC requires DLECs to provide info about location of trouble which DLECs do not have (ie., the switch or xDSL line).
- SBC refuses to “strap out” voice line to maintain service while addressing troubles on line split data line.
- **Impact:** Data trouble resolution needlessly delayed. Voice service is needlessly disconnected to fix data troubles.

Discriminatory versioning policy*(CHOICE Petition Att. D at pp. 7-8)*

- SBC currently requires both the voice CLEC and the DLEC in a line-splitting configuration to use the same EDI version.
- **Impact:** SBC artificially limits the number of potential CLEC/DLEC partnerships. CLECs and DLECs forced to incur unnecessary software upgrade expenses.

Multiple orders required*(CHOICE Petition Att. D at pp. 8-9)*

- Voice order must complete (both physically and electronically) before line split loop can be ordered or pre-qualified.
- SBC can place single order for voice and data bundle.
- **Impact:** Delays line splitting provisioning by at least 3-5 days, impeding CLECs’ ability to bundle.

Policies discriminate against small businesses*(CHOICE Petition Att. D at pp. 9-10)*

- SBC does not allow line splitting customers to have line splitting on a line with call hunting unless every line in the hunt group has DSL.
- **Impact:** CLECs are limited in their ability to offer voice/data bundles to small businesses.

No process for migration from line splitting to UNE-P*(CHOICE Petition Att. D at pp. 10-12)*

- SBC requires the voice line to be disconnected in order for the line split DSL to be disconnected.
- **Impact:** CLECs forced to use lengthy manual process, including customer disconnect, in order to perform migrations.